## Case 1:21-cr-00589-JPC Document 12 Filed 04/25/24 Page 1 of 2

## Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

United States District Judge

Barry D. Leiwant Interim Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

April 25, 2024

By ECF

Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street

proposed modification is appropriately 2024, and whether any further more pending further order of the Court.

SO ORDERED.

New York, N.Y. 10007

The request is granted in part. The sentencing is adjourned to August 5, 2024, at 2:00 p.m. The Court intends to address the requested modification to the conditions of Mr. Watson's release on May 2, 2024, at 2:00 p.m. (the date and time for which Mr. Watson's sentencing was initially scheduled). At that time, the parties and Probation should be prepared to address why the proposed modification is appropriate, given the issues discussed at the bail argument on April 12, 2024, and whether any further modifications are appropriate. The current conditions remain in place pending further order of the Court.

SO ORDERED. April 25, 2024 New York, New York

Re: United States v. Andre Watson, 21 Cr. 589 (JPC)

Dear Judge Cronan:

I write on consent – Assistant U.S. Attorney Joseph Rosenberg and U.S. Probation Officer Robert Terry Brooks – to respectfully request that the Court adjourn sentencing in this matter for around 90 days.

The background for the request is as follows: Mr. Watson was arrested by the NYPD on the underlying case on September 24, 2021, at which time federal supervision was transferred to the Southern District of New York, and an arrest warrant was issued based on alleged violations of supervised release. On April 11, 2024, Mr. Watson, who had been sentenced on the underlying case to a term of three years' imprisonment and three years' post-release supervision, was released from state custody and taken into federal custody. On April 12, 2024, Mr. Watson admitted to violating the conditions of supervised release by committing the underlying state offense, and the Court adjourned sentencing to May 2, 2024, releasing Mr. Watson on conditions including home detention enforced by electronic monitoring. Since his release, Mr. Watson has been wholly compliant with the conditions of release, and has also reported as required to his state parole officer.

The reason for the adjournment request is to allow Mr. Watson time to demonstrate to the Court that he can continue to comply with all of the conditions of supervision and build on the positive work that he did while incarcerated. Given the fundamental purpose of supervised release, taking into account the long state sentence that Mr. Watson has served, and the fact that Mr. Watson's first appearance in the Southern District of New York was on April 12, 2024, the adjournment will provide essential data for the parties in making their sentencing recommendations, and for the Court in fashioning an appropriate sentence.

If the Court grants the request, the parties further request that the Court terminate the condition of location monitoring, with all other conditions to remain in place.

Honorable John P. Cronan April 25, 2024 Page 2

Re: United States v. Andre Watson, 21 Cr. 589 (JPC)

Respectfully submitted,

<u>/s</u>/

Martin S. Cohen Ass't Federal Defender (646) 588-8317

Cc: Joseph Rosenberg, Esq., by ECF and e-mail Robert Terry-Brooks, U.S. Probation Officer, by e-mail